

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

v.

SEAN COMBS,

Defendant.

24-cr-542 (AS)

**DECLARATION OF TENY GERAGOS KRISHNASWAMY**

I, Teny Rose Geragos Krishnaswamy, declare as follows:

1. I am a partner at Agnifilo Intrater LLP, counsel for Sean Combs. I am licensed and in good standing to practice law in the States of New York and California and I am also admitted to the United States District Court for the Southern District of New York.

2. The declaration is based on my personal knowledge of the facts stated herein, and is submitted in support of Mr. Combs's Reply Memorandum in further support of his Motion To Exclude Rule 413 and 404(b) Evidence.

3. Attached hereto as **Exhibit H** is an email from the government to defense counsel dated March 10, 2025.

4. Attached hereto as **Exhibit I** is 3500 material pertaining to Victim-3, marked [REDACTED].

5. Attached hereto as **Exhibit J** is 3500 material pertaining to Victim-3, marked [REDACTED].

6. Attached hereto as **Exhibit K** is an excerpt of 3500 material pertaining to [REDACTED]  
[REDACTED]

7. Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Dated: April 1, 2025  
New York, NY

/s/ Teny Geragos  
Teny Rose Geragos, Esq.